IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE

Jeremiah D. Yates and Kimberly Yates,
Debtors

Case No. 19-23860-glt Chapter 13

Jeremiah D. Yates and Kimberly Yates, Movants,

- vs. -

Ronda J. Winnecour, Trustee, Respondent.

Related Trustee Certificate of Default at at Doc No. 64, and Order requiring response at Doc No.65

NOTICE OF PROPOSAL TO CURE PLAN DEFAULTS

- 1. Debtors propose to cure the plan default as pleaded in the Trustee's Certificate of Default.
- 2. The cure shall be effected as follows: applying for mortgage loan modification and continuing to make plan payments
- 3. All Objections to the proposed cure must be filed and served by no later than 21 days after the date of this Notice upon the Debtor and Chapter 13 Trustee. Untimely Objections will not be considered. Any creditor who files a timely Objection to the cure must appear at the scheduled Conciliation Conference on the proposed cure.
- 4. A virtual (via Zoom) Conciliation Conference on the proposed cure will be held on August 18, 2022 at 10 a.m., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at http://www.ch13pitt.com/calendar/several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at http://www.ch13pitt.com/ and to comply with the procedures set forth at that site for conference participation.

RESPECTFULLY SUBMITTED, this 1st day of July 2022.

/s/Shawn N. Wright Shawn N. Wright, Esquire Attorney for Debtor; PA ID64103 7240 McKnight Road Pittsburgh, PA 15237 (412) 920-6565 shawn@shawnwrightlaw.com